Statement of Basis

for

Modification of Permit No. WA0000728 Coast Seafood, South Bend June 2004

Ecology issued this permit on April 18, 2001 and it became effective June 30, 2001. A site inspection March 23, 2004 revealed that only the wastewater flow volume from the main processing building was being used for effluent calculations. The intent of the permit is to require that all wastewater sources are sampled and the total flow volume from all sources, added together, is used to calculate loadings to the river. However, the permit did not explicitly indicate this procedure. The purpose of this modification is to make the requirement clear, and provide necessary updates at the same time.

The proposed changes to the Coast Seafood permit are as follows: 1) in section S1.A., a description of allowed discharges is added; 2) in section S1A., footnote b is modified to correct an error. It now reads "If only one sample is taken during the calendar month, the <u>Average Monthly</u> effluent limitation applies to the sample."; 3) in section S3.A., the DMR form submittal requirement is modified to include "<u>postmarked or received</u> no later than the 15th day ..."; and 4) in section S2.A., the monitoring requirement for TSS is changed from a "Sample Type" of "24-Hour Composite" to "Composite", and footnote 'a' is added, which prescribes that TSS be collected as a four-grab composite rather than a 24 hour composite sample. A 24 hour composite is unnecessary because the facility does not operate more than 10-12 hours per day. A four grab composite will be representative, since the concentration of TSS in the wastewater appears to be quite consistent throughout the processing day.